

THE HONORABLE ROBERT S. LASNIK  
THE HONORABLE S. KATE VAUGHAN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

LAKE VIEW WEST CONDOMINIUM  
ASSOCIATION, a Washington Non-Profit  
Corporation,

Plaintiff,

v.

TRAVELERS PROPERTY CASUALTY  
COMPANY OF AMERICA, a Connecticut  
corporation; TRAVELERS PROPERTY  
CASUALTY INSURANCE COMPANY, a  
Connecticut corporation, THE TRAVELERS  
COMPANIES, INC., Minnesota corporation;  
THE AETNA CASUALTY AND SURETY  
COMPANY, a Connecticut Corporation;  
TRAVELERS CASUALTY AND SURETY  
COMPANY, a Connecticut corporation; THE  
TRAVELERS INDEMNITY COMPANY, a  
Connecticut corporation; THE TRAVELERS  
INDEMNITY COMPANY OF AMERICA, a  
Connecticut corporation; and DOE  
INSURANCE COMPANIES 1-10,

Defendants.

No. C21-0965-RSL-SKV

STIPULATED MOTION FOR  
CONTINUING PRETRIAL LITIGATION  
DEADLINES

**NOTE ON MOTION CALENDAR:**

**June 29, 2022**

Plaintiff Lake View West Condominium Association (the “Association”) and  
Defendants Travelers Property Casualty Company of America (“TPCCA”), Travelers

Property Casualty Insurance Company (“TPCIC”), Aetna Casualty and Surety Company (“ACSC”), Travelers Casualty and Surety Company (“TCSC”), The Travelers Indemnity Company (“TIC”), and The Travelers Indemnity Company of America (“TICA”) (together, the “Travelers Defendants”) stipulate to this motion for a continuance of the pre-trial deadlines and respectfully request a short extension of pre-trial deadlines.

Counsel for the Plaintiff recently returned from family leave and counsel for both parties are scheduled to be in trial against one another in another unrelated matter for multiple weeks beginning on August 22. The parties need more time to take depositions and file motions for summary judgment regarding damage, causation, timing of damage, and the correct interpretation of policy language and Washington law. Extending the pre-trial deadlines will allow time for depositions and summary judgment motions, which will clarify and define the issues for trial. Counsel for the Association and the Travelers Defendants have conferred and propose a 90-day extension of the following deadlines:

Event	Current Deadline	New Deadline
Disclosure of expert testimony under FRCP 26(a)(2) due	07/5/22	10/3/2022
Disclosure of rebuttal expert testimony under FRCP 26(a)(2) due	07/26/22	10/24/2022
All motions related to discovery must be filed by this date and noted for consideration no later than the third Friday thereafter (see LCR 7(d) or LCR 37(a)(2))	8/24/22	11/22/2022
Discovery completed by	9/23/22	12/22/2022
All dispositive motions must be filed by this date and noted for consideration no later than the fourth Friday thereafter (see LCR 7(d))	10/24/22	1/23/2023

The Parties believe that there is good cause under Federal Rule of Civil Procedure 6(b) and Local Civil Rule 10(g) for a continuance of certain pretrial deadlines due to the

reasons set forth above.

DATED: June 29, 2022

Bullivant Houser Bailey PC

By: s/ Daniel R. Bentson

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Company, Travelers Casualty & Surety  
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Company of America

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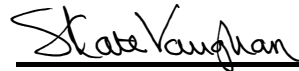
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Attorneys for Plaintiff Lake View West  
Condominium Association

IT IS SO ORDERED this 30th, day of June 2022.



S. KATE VAUGHAN

United States Magistrate Judge

4866-1684-2278.1